

ORIGINAL

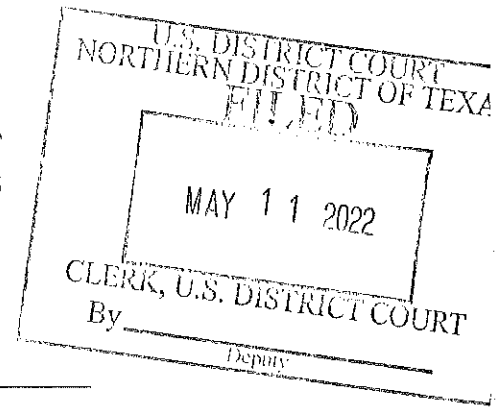
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

ULYSSES TORRES (01)

No. 4:22-MJ- 344



CRIMINAL COMPLAINT

I, Special Agent Mark Feltz, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Alleged Offense: Felon in Possession of a Firearm

On, or about, May 10, 2022, in the Fort Worth Division of the Northern District of Texas, the defendant **Ulysses TORRES**, did knowingly and unlawfully possess two firearms firearm, a Glock, model 43X, 9mm pistol, with serial number BTTU273, and a SIG-Sauer, model P365, 9mm pistol, with serial number 66B275981, which travelled in, or affected, interstate commerce, and did so knowing he had been convicted of a crime punishable by imprisonment for a term in excess of one year.

In violation of Title 18, United States Code, § 922(g)(1) and 924(a)(2).

Affiant Background

I, Special Agent (SA) Mark Feltz, Affiant, state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), assigned to the Fort Worth Field Office, in the Dallas Field Division. I have been an ATF Special Agent since February 2006, and prior to ATF I was a Special Agent with the Air Force Office of Special Investigations (AFSOI), and the Social Security Administration, Office of the Inspector General, Office of Investigations.

I am a graduate of the Criminal Investigator Training Program, at the Federal Law Enforcement Training Center, the AFOSI Basic Special Investigations Course, the Office of the Inspector General Transition Course, and the ATF Special Agent Basic Training. This affidavit is based on information known to me, and other sworn law enforcement officers. The information set forth in this affidavit is not intended to detail each and every fact and circumstance of the investigation, or all information known to me or others in this investigation. Rather, this affidavit sets forth facts to establish probable cause to believe **Ulysses TORRES** knowingly, and unlawfully, possessed a firearm, which travelled in, or affected, interstate commerce, and did so knowing he had been convicted of a crime punishable by imprisonment for a term in excess of one year.

Facts in Support of Probable Cause

1. On April 30, 2022, Fort Worth Police Officers attempted to stop a vehicle, which evaded the officers. Fort Worth Officers were able to identify the driver as **Ulysses TORRES**, (white male, 5'09", 150#, DOB: 11/19/1997, FBI#: 965442VD1), and obtained a warrant to arrest **TORRES** for evading.
2. On May 10, 2022, Fort Worth Police Officers located a vehicle, 2013 Chevrolet Tahoe, with license plate CWG3084, being driven by **TORRES**. Registration records showed the vehicle is currently registered to **Ulysses TORRES**.

3. Officers followed the vehicle, and verified **TORRES** was the driver of the vehicle. Officers followed the **TORRES** to the parking lot for a Sprouts grocery store, located at 5711 Interstate 20, Arlington, TX 76017, which is within the Northern District of Texas. Officers contacted **TORRES** when **TORRES** exited the vehicle, and took **TORRES** into custody. During the arrest officers observed the strong odor of marijuana coming from the vehicle. Based on probable cause to believe **TORRES** was in possession of marijuana, officers searched the vehicle to recover the firearm, and search for additional evidence of firearm possession by **TORRES**. The firearm in the center console was a Glock, model 43X, 9mm pistol, with serial number BTTU273, and was loaded, including a round of ammunition in the chamber of the firearm. Officers also discovered a SIG-Sauer, model P365, 9mm pistol, with serial number 66B275981, inside the center console, which had a loaded magazine, but no round in the chamber of the firearm. In addition to the firearms officers recovered suspected marijuana, and more than \$40,000 in US Currency.

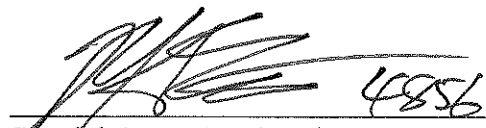
4. National Crime Information Center (NCIC) queries for **TORRES**, resulted in criminal history records for **TORRES**, with multiple arrests, starting in 2013. In addition to misdemeanor convictions, the NCIC records indicate **TORRES** has the following felony arrests, and convictions:

a. 2015: Arrest by Arlington PD, for Burglary of a Habitation, resulting in a conviction for Burglary of a Building, in Tarrant County.

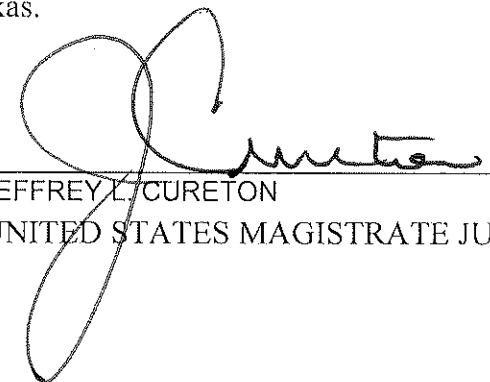
- b. 2016: Arrest by Mansfield PD, for theft of property, resulting in a conviction for theft of property, in Tarrant County.
 - c. 2016: Arrest by the Tri-County Auto Burglary Theft Prevention Task Force, for theft of property, and for evading, resulting in a conviction for theft of property, and evading, in Tarrant County.
 - d. 2018: Arrest by Arlington PD, for fraudulent use/possession of identifying information, resulting in a conviction for fraudulent use/possession of identifying information, in Tarrant County.
5. Based on the description of the firearms, a Glock, model 43X, 9mm pistol, with serial number BTTU273, and a SIG-Sauer, model P365, 9mm pistol, with serial number 66B275981, provided by Fort Worth Police Officers, SA Feltz determined the firearms had traveled in, or affected interstate or foreign commerce, prior to being recovered in this investigation.

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Based upon the above facts and circumstances, I submit there is probable cause to believe that **Ulysses TORRES**, a previously convicted felon, did knowingly and unlawfully possess firearms, a Glock, model 43X, 9mm pistol, with serial number BTTU273, and a SIG-Sauer, model P365, 9mm pistol, with serial number 66B275981, in violation of 18 U.S.C. § 922(g)(1) and 924(a)(2).


Special Agent Mark Feltz
Bureau of Alcohol, Tobacco, Firearms, and Explosives

SWORN AND SUBSCRIBED before me this 11th day of May, 2022 at 11:22 ~~am~~ pm, in Fort Worth, Texas.


JEFFREY L. CURETON
UNITED STATES MAGISTRATE JUDGE